

## COVER SHEET FOR AMENDMENT OF POST-TRAVEL SUBMISSION

Date/Time Stamp

RECEIVED  
SECRETARY OF THE SENATE  
PUBLIC RECORDS

2023 MAY 11 PM 2:00

**Instructions:** Use this form as a cover sheet for any paperwork you may need to submit to the **Office of Public Records** in order to make your Privately Sponsored Post-Travel Submission complete in accordance with Rule 35. **Only complete this form if you need to submit an amendment to a post-travel filing you have already submitted.**

SUBMIT DIRECTLY TO THE OFFICE OF PUBLIC RECORDS IN 232 HART BUILDING

Name of Traveler: Leigh Hildebrand

Employing Office/Committee: Parliamentarian/Secretary of the Senate

Travel Expenses Paid by (List all sources): Renew Democracy Initiative

Travel Date(s): April 27-28, 2023

Changes from original submission prior to travel are noted on Re-2 form

Description/Title of Attached Forms: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Purpose of Amendment (describe the reason for amending original submission): \_\_\_\_\_

Increase in transportation and lodging costs; decrease in meal costs  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5-10-23

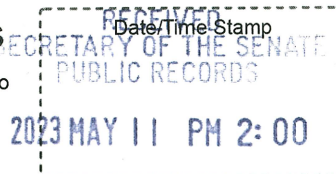
(Date)



(Signature of Traveler)

## RE-2 Employee Post Travel Disclosure of Travel Expenses

**Post Travel Filing Instructions:** Complete this form within **30 days** of returning from travel. Submit all forms to the Office of Public Records in 232 Hart Building. **This form is a public disclosure. The form and all attachments will be made publicly available.**



**Certification:** *In compliance with the Regulations Governing Privately Sponsored Travel, Senate Rule 35, and the Honest Leadership and Open Government Act of 2007, I certify that I accepted the following gift of privately sponsored travel:*

**Private Sponsor(s):**

**Travel Dates:**

Renew Democracy Initiative (RDI)

April 27-28, 2023

**Name of accompanying family member (if any):**

**Relationship to Traveler:**

**Total Expenses**

Transportation Expenses	Lodging Expenses	Meals Expenses	Other Expenses (Amount & Description)
543.00	369.00	155.00	

*I also certify that attached to this form are all required documents for post travel disclosure, including:*

- The final **Employee Pre-Travel Authorization** (Form RE-1)
- The final **Private Sponsor Travel Certification Form** with all attachments
- The final invitation
- The final approved itinerary

*Finally, I certify that all trip information reflected in the attachments above accurately reflects the travel that I accepted. If there were any changes to the trip after I received approval from the Committee, the changes are described in ATTACHMENT 1.*

5/10/23

Leigh G Hildebrand

Date

Printed Name of Traveler

Signature of Traveler

**TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER**

*I have made a determination that the expenses set out above in connections with travel described in the Employee Pre-Travel Authorization form, are necessary transportation, lodging, and related expenses as defined in Rule 35.*

Date

Signature of Supervising Senator/Officer

## ATTACHMENT 1 – CHANGES FROM APPROVED PRE-TRAVEL

**Note:** Material changes to a trip that occur after the Committee has issued an approval letter may invalidate the Committee's approval. Please contact the Committee with any questions regarding changes to an approved trip.

Were there any changes to the pre-approved travel expenses? (Transportation, Meals, Lodging, Other)?

☒ Yes☐ No

Expense Change	Revised Amount	Explanation
Transportation	543.00	Price increase due to delay in trip approval
Meals	155.00	Unclear why price for meal decreased
Lodging	369.00	Price increase due to delay in trip approval

Were there any changes to the pre-approved itinerary?

☐ Yes☒ No

Explanation:

Were there any additional changes to the pre-approved trip?

☐ Yes☒ No

Explanation:

CHRISTOPHER A. COONS, DELAWARE, CHAIRMAN  
JAMES LANKFORD, OKLAHOMA, VICE CHAIRMAN

BRIAN SCHATZ, HAWAII  
JEANNE SHAHEEN, NEW HAMPSHIRE

JAMES E. RISCH, IDAHO  
DEB FISCHER, NEBRASKA

SHANNON HAMILTON KOPPLIN, CHIEF COUNSEL AND STAFF DIRECTOR  
WILLIAM B. CABLE, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220  
SECOND AND CONSTITUTION AVENUE, NE  
WASHINGTON, DC 20510-6425

TELEPHONE: (202) 224-2981  
FACSIMILE: (202) 224-7416  
TDD: (202) 228-3752

## United States Senate

### SELECT COMMITTEE ON ETHICS

April 21, 2023

Leigh Hildebrand  
Office of the Secretary of the Senate  
United States Senate  
Washington, DC 20510

Dear Ms. Hildebrand:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you received to travel to the 2023 Heroes of Democracy Awards Gala, on April 27–28, 2023, sponsored by the Renew Democracy Initiative (RDI). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from RDI in connection with this trip.

### Background

Based on your communication with the Committee, the background in this matter is as follows.<sup>1</sup> You are employed as the Senior Assistant Parliamentarian for the Office of the Secretary of the Senate, and Secretary Sonceria Ann Berry is your supervising officer. RDI invited you to travel to the 2023 Heroes of Democracy Awards Gala in New York, New York, on April 27–28, 2023. RDI certified to the Committee that it will pay the necessary expenses<sup>2</sup> related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. RDI has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist or agent of a foreign principal will accompany you at any point throughout your trip.<sup>3</sup>

### Discussion

Privately sponsored travel includes any gift of travel and travel-related expenses for travel outside the Senate duty station, including transportation, lodging, food and refreshments, and conference fees and materials, whether paid for directly, reimbursed, or provided directly, from a private individual or entity, in connection with a Member's, officer's, or employee's official Senate duties. Incorporating reforms from the Honest Leadership and Open Government Act of 2007 (HLOGA), Pub. L. 110–81 (2007), Senate Rule 35.2 permits Members, officers, and

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<sup>1</sup> If this letter does not correctly recite the facts, contact the Committee immediately.

<sup>2</sup> The term “necessary expenses” has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 10-13.

<sup>3</sup> The term “any point throughout your trip” has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 15.



employees to accept privately sponsored travel only with the prior written approval of the Committee.

The Committee's approval process is governed by the *Regulations and Guidelines for Privately Sponsored Travel (Travel Regulations)*. The *Travel Regulations* contain detailed requirements regarding who may sponsor travel; time limits for trips; and the type and amount of expenses that can be reimbursed.

Entities that do not retain or employ a lobbyist or foreign agent and all non-profit organizations designated as tax-exempt organizations under § 501(c)(3) of the Internal Revenue Code of 1986, regardless of whether they retain or employ a lobbyist or foreign agent, may sponsor domestic trips for up to three days. The three-day limitation means three 24-hour periods, calculated from the time of arrival in the trip location to the time of departure from the trip location. For such trips, neither lobbyists nor foreign agents may accompany a Senate invitee at any point throughout the trip, other than in a *de minimis* way.<sup>4</sup> This means that neither lobbyists nor foreign agents may accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited.<sup>5</sup>

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately Sponsored Travel**.

Consistent with these standards, Committee precedent, and RDI's factual representations, it appears that it is permissible for you to accept necessary expenses from RDI in connection with this trip, provided that the actual travel and travel-related expenses conform to the information and materials you provided, and the travel and all required documents are disclosed to the Secretary of the Senate (Office of Public Records).

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<sup>4</sup> The term "*de minimis*" has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 6-8.

<sup>5</sup> See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 6-10.

Finally, Senate Rule 34 requires a reporting individual,<sup>6</sup> on their financial disclosure report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$480 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their financial disclosure report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Shannon Hamilton Kopplin  
Chief Counsel and Staff Director

Enclosure: Employee Privately Sponsored Travel Checklist

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<sup>6</sup> A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$141,022 for CY 2023) or is a political fund designee and is required to file financial disclosure reports.